

RICHARD TAN, SBN 327366
LAW OFFICES OF RICHARD TAN
3020 Bridgeway, Suite 192
Sausalito, CA 94965
Telephone: (510) 345-3246
Facsimile: (415) 532-1310
Email: richardtan@tutanota.com

Attorneys for Plaintiffs,
KEITH H. WASHINGTON,
SAN FRANCISCO BAY VIEW
NATIONAL BLACK NEWSPAPER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KEITH H. ("MALIK") WASHINGTON, an
individual; and SAN FRANCISCO BAY
VIEW NATIONAL BLACK NEWSPAPER,
a California corporation,

Plaintiffs,

vs.

FEDERAL BUREAU OF PRISONS, a
public agency of the United States; THE
GEO GROUP, INC., a Florida corporation,
dba GEO CALIFORNIA, INC.; MONICA
HOOK, an individual; MARIA RICHARD,
an individual; WILL GOMEZ, an
individual, MURTALA LANVAL, an
individual, and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 3:21-cv-00787

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER AND/OR ORDER TO SHOW
CAUSE AND FOR PRELIMINARY
INJUNCTION**

Having considered all material filed in support of and in opposition to
Plaintiffs' Application for a Temporary Restraining Order and/or Order to Show

Washington v. Federal Bureau of Prisons, Case No.
[Proposed] Order Granting Plaintiffs' Application for a Temporary Restraining Order
and/or Order to Show Cause for Preliminary Injunction

1 Cause for Preliminary Injunction, and having considered the arguments of counsel,
2 and good cause appearing:

3 IT IS HEREBY ORDERED that Plaintiffs' Application for a Temporary
4 Restraining Order and/or Order to Show Cause for Preliminary Injunction is
5 GRANTED.

6
7 Defendants and all persons acting with them or under their control are enjoined
8 from retaliating, whether via inmate discipline or other means, against Mr.
9 Washington for speaking with members of the press until his pre-release status ends
10 on May 31, 2021.

11 Defendants are prohibited from imposing disciplinary sanctions arising from
12 the incident report of February 4, 2021.

13 The disciplinary charges of February 4, 2021 are declared void.

14
15 Defendants and all persons acting with them or under their control are further
16 ordered to :

- 17 1. Revoke the disciplinary sanction against Mr. Washington, Report No.
18 3466318, and remove the sanction from Mr. Washington's record;
- 19 2. Restore Mr. Washington's good time credits (14 days), which have delayed
20 his expected date for home confinement and expected release date;
- 21 3. Revoke the requirement that Mr. Washington fill out a "News Interview
22 Authorization Form" before he speaks with members of the press;
- 23 4. Permit Mr. Washington to speak with members of the press freely, both in
24 a personal capacity, for work purpose, and for interviews;
- 25 5. Return Mr. Washington's cell phone to him.

26
27 IT IS FURTHER ORDERED that Defendants show cause before this Court at

28 _____, United States Courthouse, the Northern District

1 of California, on the _____ day of _____, 2021 at _____ o'clock
2 ____m., or such other date as may be fixed by the Court, why a preliminary
3 injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, should not
4 be issued ordering the Defendants, and all persons acting with them or under their
5 control, pending the final hearing and determination of this action, to :

- 6
7 1. Revoke the disciplinary sanction against Mr. Washington, Report No.
8 3466318, and remove the sanction from Mr. Washington's record;
- 9 2. Restore Mr. Washington's good time credits (14 days), which have delayed
10 his expected date for home confinement and expected release date;
- 11 3. Revoke the requirement that Mr. Washington fill out a "News Interview
12 Authorization Form" before he speaks with members of the press;
- 13 4. Permit Mr. Washington to speak with members of the press freely, both in
14 a personal capacity, for work purpose, and for interviews;
- 15 5. Return Mr. Washington's cell phone to him.

16
17 Defendants shall also show cause before this Court at the aforementioned
18 location and time why a preliminary injunction, pursuant to Rule 65 of the Federal
19 Rules of Civil Procedure, should not be issued enjoining the Defendants, and all
20 persons acting with them or under their control, pending the final hearing and
21 determination of this action, from retaliating whether via inmate discipline or other
22 means, against Mr. Washington for speaking with members of the press until his
23 pre-release status ends on May 31, 2021.

1 IT IS SO ORDERED.

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3 Dated:

4 _____
5 Hon. Jon S. Tigar
6 UNITED STATES MAGISTRATE JUDGE
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